



49 Market Street
Morristown, NJ 07960-5122
Tel 973.992.4800 Fax 973.992.9125
www.foxrothschild.com

Catherine Youngman
Office Managing Partner

KIERAN ENSOR
Direct No: 973 548 3378
Email: KEnsor@FoxRothschild.com

July 28, 2022

VIA ECF

The Honorable Esther Salas, U.S.D.J.
United States District Court for the District of New Jersey
M.L. King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey

**Re: Legal Bay LLC v. Mustang Funding, LLC, et al.
Civ. A. No. 22-3941 (ES) (JBC)**

Dear Judge Salas:

This firm represents plaintiff, Legal Bay, LLC (“Legal Bay”) in the above-captioned matter. We write with consent of counsel for defendants, Mustang Funding, LLC, Mustang Specialty Funding I, LLC, Mustang Specialty Funding II, LLC, James Beltz, and Kevin Cavanaugh (collectively, “Defendants”) to submit and propose the following motion schedule related to Defendants’ Motion to Dismiss, ECF No. 19.

Following Defendants’ removal from the Superior Court of New Jersey, Essex Vicinage on June 15, 2022, (ECF No. 1), and the Court’s signing of the parties’ consent order extending Defendants’ time to answer, move, or otherwise respond on June 22, 2022, (ECF Nos. 16, 17), Defendants moved to dismiss on July 22, 2022. (ECF No. 19). The motion is presently returnable August 15, 2022. Following a meet and confer, the parties agreed upon the following proposed schedule:

- August 31, 2022 – Legal Bay’s motion response due
- September 19, 2022 – Defendants’ reply due
- October 3, 2022 – Return date for Motion to Dismiss (oral argument requested)

A Pennsylvania Limited Liability Partnership



The Honorable Esther Salas, U.S.D.J.

July 28, 2022

Page 2

If this proposed briefing schedule is acceptable, the parties respectfully request that the Court “So Order” this letter.

We thank the Court for its time and consideration of this matter.


Respectfully submitted,



Kieran T. Ensor

cc: All counsel of record via ECF.

So Ordered.



Hon. Esther Salas, U.S.D.J.

Dated: July 29, 2022